

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HAYNES INTERNATIONAL, INC.,	)	
a Delaware corporation,	)	
	)	
Plaintiff,	)	Civil Action No. 04-197(E)
	)	
v.	)	JURY TRIAL DEMANDED
	)	
ELECTRALLOY, a Division of G.O.	)	
CARLSON, INC.,	)	Judge Cohill
a Pennsylvania corporation,	)	
	)	
Defendant.	)	

**PLAINTIFF'S MOTION FOR LEAVE  
TO FILE DOCUMENTS UNDER SEAL**

Plaintiff, Haynes International, Inc. ("Plaintiff" or "Haynes"), by and through its undersigned counsel, Buchanan Ingersoll PC, hereby files this Motion for Leave to File Documents Under Seal. In support of its Motion, Haynes avers as follows.

Haynes is filing a Motion to Compel Discovery today, accompanied by supporting exhibits. The supporting exhibits include portions of deposition testimony provided by witnesses produced by Defendant. Haynes is attaching pertinent portions of the deposition transcripts as exhibits to its Motion to Compel Discovery. Defendant has designated such portions of the deposition transcripts as "Attorneys Eyes Only". Therefore, Plaintiff is required to file these portions of the deposition transcripts under seal.

Additionally, Plaintiff is providing a sales chart of all sales it was able to determine from invoice and purchase orders produced by Electralloy (EC0001 - EC0083). The information in this chart is taken from documents produced by Defendant which were designated "Attorneys Eyes Only". Thus, the sales chart is required to be filed under seal.

Accordingly, Haynes hereby moves this Court for an Order granting leave for Haynes to file the above-identified documents (portions of deposition transcripts and sales chart) under seal. An appropriate form of Order is attached.

Respectfully submitted,

BUCHANAN INGERSOLL PC

Dated: November 1, 2005

By: /s/ Bryan H. Opalko  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 1st day of November, 2005, a true and correct copy of the foregoing PLAINTIFF'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL was served on the attorneys for Defendant by first class mail, postage prepaid, addressed as follows:

Timothy D. Pecsénye, Esquire  
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/s/ Bryan H. Opalko

Bryan H. Opalko